

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Inquiry Concerning the Deployment of)	GN Docket No. 16-245
Advanced Telecommunications Capability to)	
All Americans in a Reasonable and Timely)	
Fashion, and Possible Steps to Accelerate)	
Such Deployment Pursuant to Section 706)	
of the Telecommunications Act of 1996, as)	
Amended by the Broadband Data)	
Improvement Act)	

**COMMENTS OF THE
NATIONAL ASSOCIATION OF TELECOMMUNICATIONS
OFFICERS AND ADVISORS**

The National Association of Telecommunications Officers and Advisors (“NATOA”) submits these comments in response to the above-captioned Twelfth Broadband Progress Notice of Inquiry (“NOI”),¹ released August 4, 2016. NATOA’s membership includes (1) local government officials and staff members from across the nation whose responsibility is to develop and administer communications policy and the provision of communications services for their communities; (2) communities that operate broadband wireline and wireless infrastructure for anchor institutions – serving the needs of government, schools, libraries, first responders, and emergency support personnel; and (3) communities that have constructed, or are in the course of

¹ *In re Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, Twelfth Broadband Progress Notice of Inquiry (“NOI”), GN Docket No. 16-245, FCC 16-100 (August 4, 2016).

constructing broadband infrastructure to meet public needs, or are offering broadband services to the public within their jurisdictions. These members manage networks in urban, suburban and rural areas across America.

NATOA and its members are representatives of the American people in the most fundamental and immediate sense. We are local governments and agencies, working directly with our respective communities to ensure that they have the most advanced communications services they need to compete in a global economy and better serve the needs of their residents. At the local level, we are in the unique position to understand what true, affordable broadband access – both fixed and wireless – might mean for our citizens and our communities.

I. The FCC Should Adopt of a New Minimum Broadband Speed Threshold

America's local governments recognize broadband as critical infrastructure – a utility that is essential to economic and community development. Every year, the demand grows for faster speeds and more capacity. It is imperative that the Commission's capacity speed benchmark – currently set at 25 Mbps/3 Mbps for fixed broadband services – keeps pace with the extraordinary growth of Internet usage and encourage future growth and innovation. The failure to do so will hinder our ability as a nation to compete with nations abroad that have outpaced us in their deployment of high capacity broadband.

We continue to believe that the establishment of a static point at which to gauge the progress and growth in the broadband market from one report to another should be avoided. Potential revisions to the current threshold and periodic updates would serve to achieve one of the long-term goals of the National Broadband Plan – to provide affordable access of actual speeds of at least 100 Mbps/50 Mbps to at least 100 million homes by 2020 – and ensure that

broadband in the United States keeps pace with technological developments and the potential consumer demands those advances may bring.

According to one study, in the first half of 2016, fixed broadband customers in the United States have seen average download speeds of over 50 Mbps and average upload speeds of nearly 19 Mbps.² Therefore, rather than keeping the current threshold of 25 Mbps/3 Mbps, which the Commission characterizes as “adequate to allow consumers to access a full range of advanced services,”³ we propose a higher speed benchmark, based upon the data provided in this proceeding, would be “better-suited . . . for current household usage of advanced broadband-based services.”⁴ This is especially true with upstream speeds. Commonly used video conferencing applications, such as Skype or Cisco Spark, require minimum upstream speeds of 1.5 Mbps to 2.0 Mbps. In order to maintain multiple concurrent streams, the current upstream minimum speed is inadequate and the Commission should immediately increase the upstream speed threshold.

II. The FCC Should Establish Speed Thresholds for Mobile Broadband

The National Broadband Plan declares that the US “should lead the world in mobile innovation, with the fastest and most extensive wireless networks of any nation.” As such, we again believe it’s time for the Commission to set a minimum speed benchmark for mobile broadband services.⁵

The growth and popularity of mobile broadband services cannot be denied and we agree with the Commission’s assertion that “speed is a central factor affecting the user experience of

² United States Speedtest Market Report, August 3, 2016, available at <http://www.speedtest.net/reports/united-states/>

³ NOI at § 17.

⁴ *Id.* at § 18.

⁵ See Comments of NATOA, GN Docket No. 12-228, at 7 (September 20, 2012).

mobile broadband services.”⁶ Therefore, based on a review of speeds that mobile broadband providers currently make available to consumers, we concur that an initial mobile speed benchmark of at least 10 Mbps/1 Mbps is appropriate, subject to annual review and adjustment.

In 2012, we suggested an initial mobile speed threshold of 3 Mbps/768 kbps.⁷ But with the continued growth of 4G services, and a recent report showing average mobile broadband speeds of 19.61 Mbps/7.94 Mbps, we believe the higher speed is appropriate.

III. Conclusion

Access to affordable, reliable broadband service is essential for all Americans. As such, a new minimum broadband speed threshold for fixed broadband services is needed that more accurately reflects the higher speeds currently available in the marketplace and meet the increasing demands of consumers. Similarly, new speed thresholds should be established for mobile broadband services that will spur innovation and increased consumer adoption of such services.

Respectfully submitted,



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⁶ NOI at ¶ 38.

⁷ See Comments of NATOA, GN Docket No. 12-228, at 8 (September 20, 2012).